

FILED IN THE
U.S. DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

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SPOKANE, WASHINGTON

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

vs.

CHRISTIAN DAVEL CAREAGA,

Defendant.

CR-11-6080-RMP

INFORMATION

Vio: 18 U.S.C. § 286
Conspiracy to Defraud
the Government with
Respect to Claims
(Count 1)

The United States Attorney Charges:

Count 1:

That from on or about January 1, 2004 until on or about November 19, 2008 in the Eastern District of Washington and elsewhere, the Defendant, CHRISTIAN DAVEL CAREAGA, and other persons both known and unknown, knowingly and willfully entered into an agreement, combination, and conspiracy with each other to defraud the United States Department of Energy, by obtaining and aiding to obtain the payment and allowance of false, fictitious, and fraudulent claims in the manner and means as follows:

It was part of the agreement, combination, and conspiracy that the Defendant, CHRIRSTIAN DAVEL CAREAGA and other persons, both known and unknown, would falsely claim to have worked certain amounts of hours for CH2M Hill Hanford Group Inc., ("CH2M Hill") allocable to the prime contract between CH2M Hill and the United States Department of Energy; contract number

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1 DE-AC27-99RL14047 ("the prime contract"). It was further a part of the
2 agreement, combination, and conspiracy that the Defendant, CHRIRSTIAN
3 DAVEL CAREAGA, and other persons, both known and unknown, would falsely
4 claim to have worked eight hours of overtime allocable to the prime contract when
5 in truth and in fact the Defendant, CHRIRSTIAN DAVEL CAREAGA, and
6 persons both known and unknown, had not worked eight hours of overtime.

7 It was further part of the agreement, combination, and conspiracy that the
8 Defendant, CHRIRSTIAN DAVEL CAREAGA, and other persons, both known
9 and unknown, would take actions designed to avoid detection of the agreement,
10 combination, and conspiracy, by law enforcement, to wit: on or about May of 2008
11 a direct supervisor of the Defendant, CHRIRSTIAN DAVEL CAREAGA, (herein
12 "the supervisor") received an anonymous text reading "You are requested to have
13 all you Base Ops HPT's working overtime this evening to return back to work or
14 face disciplinary actions," the supervisor verified that in fact employees were not
15 on site; the supervisor contacted multiple employees and directed them, contrary
16 to the normal practice of the agreement, combination, and conspiracy, to claim
17 hours they actually worked; the supervisor did not formally discipline any
18 employees; the supervisor later knowingly approved false claims made by
19 employees, including false claims by the Defendant, CHRIRSTIAN DAVEL
20 CAREAGA, subsequent to May of 2008, claiming payment for hours not worked.

21 Under the prime contract the fully burdened cost of labor allocable to the
22 prime contract was borne by the United States Department of Energy. In this
23 manner the United States Department of Energy bore the full loss caused by the

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1 false, fictitious, and fraudulent claims of the Defendant, CHRISTIAN DAVEL
2 CAREAGA.

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4 All in violation of Title 18, United States Code, Section 286.

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6 DATED this 21st day of November, 2011.

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10 Michael C. Ormsby
United States Attorney

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12 Tyler H.L. Tornabene
13 Assistant United States Attorney
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